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July 12, 2017

Honorable Katherine B. Forrest  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: **United States v. Shulaya, et al, 17-cr-350 (KBF)**  
**Appointment of Associate Counsel for Defendant Akaki Ubilava**

Dear Judge Forrest:

I am appointed to represent Akaki Ubilava under the Criminal Justice Act, 18 U.S.C. § 3006A ("CJA"). I write to request the appointment of Clara Kalhous, Esq., as associate counsel for Mr. Ubilava under the CJA.

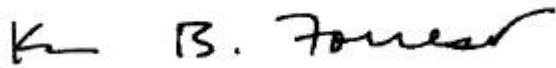
Mr. Ubilava is charged in this multi-defendant indictment with racketeering conspiracy and attempt and conspiracy to commit wire fraud (violations of 18 U.S.C. §§ 1962 and 1349). As was clear from the government's presentation at the initial conference in this matter, the evidence is beyond voluminous. In addition, I understand that there is a substantial amount of discovery that relates to Mr. Ubilava particularly. Based on a review of the indictment and preliminary meetings with Mr. Ubilava, I anticipate that there may be grounds for complex pretrial motions. Based on this extensive discovery and the anticipated motions to be researched and drafted, appointment of associate counsel would be of enormous assistance and would result in significant cost savings to the Court.

Ms. Kalhous is an experienced attorney who has been appointed under the CJA to assist me in numerous cases in the Southern and Eastern Districts of New York and the Court of Appeals for the Second Circuit. She is well qualified to undertake a comprehensive review of the applicable discovery and perform legal research and drafting, all, of course, under my guidance. If the Court grants this request, I respectfully submit that a cap of 75 hours at \$90 per hour with leave to seek additional hours, if that becomes necessary, would be appropriate.

Thank you for your consideration of this request.

7/13/2017 - Application granted. SO ORDERED.

Respectfully,  
\_\_\_\_\_/s/\_\_\_\_\_  
Donna Newman

  
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HON. KATHERINE B. FORREST, USDJ